

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK**

JASON BAKER, JOHN BREWSTER, JOANN
BREWSTER, MAXINE CONDON, KAREN
FARRELL, BROOKS LIDDIARD, JANET
LIDDIARD, JAMES MCDERMOTT, HEIDI
MCDERMOTT, PAUL MOREY, DONETTA
MOREY, JOE TODD, BONNIE TODD, TOM
WHIPPLE and PAULINE WHIPPLE,

Plaintiffs,

v.

ANSCHUTZ EXPLORATION CORPORATION,
CONRAD GEOSCIENCE CORPORATION,
PATHFINDER ENERGY SERVICES, INC. and
JOHN and JANE DOES 1 through 100,

Defendants.

Case No. 6:11-cv-06119-CJS-JWF


AFFIDAVIT OF MICHAEL J. GUZMAN

I, **MICHAEL J. GUZMAN**, having been duly sworn, hereby certify as follows:

1. I am a partner with the law firm Kellogg, Huber, Hansen, Todd, Evans & Figel, P.L.L.C., Sumner Square, 1615 M Street, N.W., Suite 400, Washington, D.C. 20036, counsel for Anschutz Exploration Corporation, in the above-referenced matter. I make this Affidavit on my personal knowledge in support of Defendants' Motion for a Stay of Discovery.
2. I am familiar with the facts of this case and the matters referenced herein.
3. Attached hereto as Exhibit A is a true and correct copy of Defendants' Motion to Strike and/or Dismiss Pursuant to Rules 16(f) and 37(b) (April 22, 2013) (ECF No. 102).

I hereby declare under penalty of perjury that the foregoing statements are true.

Executed on this 22nd day of April, 2013, in Washington, D.C.

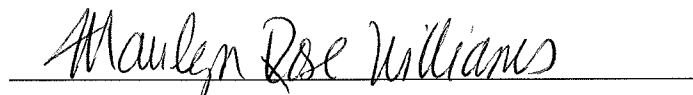


MICHAEL J. GUZMAN
KELLOGG, HUBER, HANSEN,
TODD, EVANS & FIGEL, P.L.L.C.
1615 M Street, N.W.
Suite 400
Washington, D.C. 20036
Tel. (202) 326-7900
Fax (202) 326-7999

DISTRICT OF COLUMBIA: SS

Subscribed and Sworn to before me, in my presence,

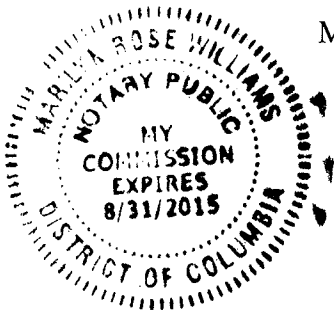
this 22nd day of April, 2013.



Notary Public, D.C.

My commission expires:

8/31/2015



MARILYN R. WILLIAMS
NOTARY PUBLIC DISTRICT OF COLUMBIA
Commission Expires August 31, 2015